



State of Ohio Environmental Protection Agency

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\*1PC0000020090127\*

MONTGOME BROOKVILLE WWTP

OSTENDORF, ROBE 2009/01/27

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

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State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korfeski, Director

January 27, 2009

Mr. John Wright  
City of Brookville  
301 Sycamore Street  
Brookville, Ohio 45309

Re: Montgomery County, Brookville WWTP, Compliance Evaluation Inspection and Notice of Violation

Dear Mr. Wright:

On January 13, 2009, Mr. Ned Sarle and I conducted a Compliance Evaluation Inspection at the City of Brookville WWTP (NPDES Permit No. OH0020605; OEPA Permit No. 1PC00000\*ID). Representing this facility was Mr. Ron Brandt, John Weist and Joe Hamiel. A copy of my inspection report is enclosed.

The inspection report contains two marginal areas. The areas rated as marginal and the reason for said rating is as follows:

1. Records / Reports: Is rated marginal as a result of the deficiencies regarding the Logbook (please refer to OAC 3745-7-09). The inspection report contains the details of the deficiencies found in this area.
2. Laboratory: Is rated marginal as a result of the use of outdated reference material (17<sup>th</sup> Edition of the Standard Methods for Examination of Water and Wastewater), instances of QA/QC data not being recorded, and instances of QA/QC procedures not being implemented (please refer to 40 CFR Part 136). The inspection report contains the details of the deficiencies.

Documentation regarding the land application of sludge at agronomic rates was not available at the time of the inspection (please refer to OAC 3745-40-04). The City of Brookville is required to provide said documentation by no later than February 12, 2009.

The areas noted above as marginal will require a written response by February 12, 2009. The response should include a description of the actions proposed to correct the deficiencies and the dates anticipated for completion of these actions.



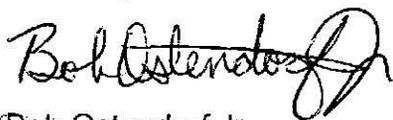


Mr. John Wright  
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This report also serves as a Notice of Violation for the violations identified in Attachment 1. Responses for the violations identified in Attachment 1 are currently on file and an additional response is not required.

If you have any questions regarding this matter please feel free to contact me at (937) 285-6107 or via email at: [Robert.Ostendorf@epa.state.oh.us](mailto:Robert.Ostendorf@epa.state.oh.us) .

Sincerely,

A handwritten signature in black ink that reads "Bob Ostendorf Jr." with a stylized flourish at the end.

Bob Ostendorf Jr.  
Division of Surface Water  
Permits Section

Enclosure

cc: Mr. Ron Brandt, City of Brookville



### ATTACHMENT 1

Effluent Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2008	001	TSS	Weekly Qty	54.6	100.624	3/1/2008
March 2008	001	CBOD	Weekly Qty	45.5	101.680	3/1/2008
March 2008	001	TSS	Weekly Qty	54.6	168.758	3/15/2008
March 2008	001	CBOD	Weekly Qty	45.5	48.6050	3/15/2008

Frequency / Reporting Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2008	901	Oil and Grease	1/2Weeks	1	0	01/01/2008
January 2008	001	Oil and Grease	1/2Weeks	1	0	01/01/2008
January 2008	601	Oil and Grease	1/2Weeks	1	0	01/01/2008
January 2008	801	Oil and Grease	1/2Weeks	1	0	01/01/2008





State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0020605	1PC00000*ID	1-13-09	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookville WWTP 610 South Wolf Creek Pike Brookville, OH 45309	12:30	6/1/08
	Exit Time	Permit Expiration Date
	2:30	5/31/13
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ron Brandt – Superintendent	(937) 833-2135	
John Weist – WWTP Operator	(937) 833-2515	
Joe Hamiel – WWTP Operator	(937) 833-2515	
Name, Address and Title of Responsible Official	Phone Number	
John Wright – City Manager 301 Sycamore Street Brookville, OH 45309	(937) 833-2135	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
M	Records/Reports	M	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
Inspector		Reviewer	
<i>Bob Ostendorf Jr.</i>		<i>Debra Roth for</i>	
Date		Date	
1-20-09			
Bob Ostendorf Jr. Division of Surface Water Southwest District Office		Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	

Sections E thru K: Complete on all inspections as appropriate



Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

**Section F: Compliance**

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:



**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y  
 Class: II
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A  
 On MORs  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

**Record Keeping:**

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)  

Spiral bound daily calendar used for entries.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
  - I. Identification of treatment works..... N
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N
  - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
  - IV. Laboratory results (unless documented on bench sheets)... Y
  - V. Identification of person making log entries..... N
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A



**Section G: Operation & Maintenance (con't)**

**Collection System:**

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power  
or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),  
or were there any major repairs to collection system since  
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... Y

**Comments/Status:**

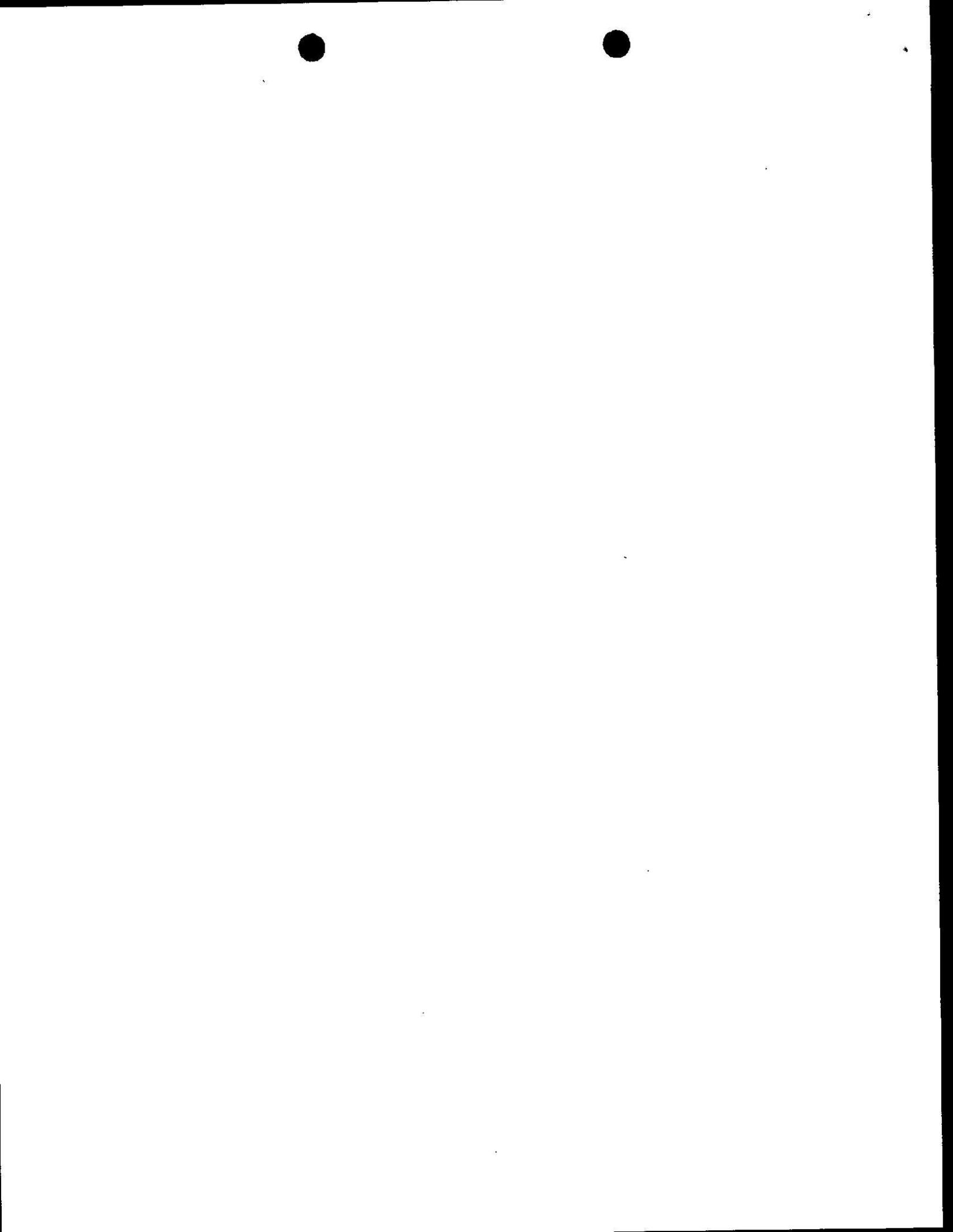
The lift stations do not have a permanent stand-by generator. A portable generator is present at the WWTP and is transported to the lift stations should the need arise. The alarm system for the lift station is radio alarmed which calls so that an operator can be dispatched to address the situation.

The staff recently replaced the bearings on a surface aerator. Staff stated that at no time was the capacity of the plant jeopardized. The unit was offline for a minimum amount of time and was being placed back into service on the day of this inspection. Currently several spreadsheets have been developed for tracking of maintenance which has been performed on critical equipment within the plant.

Inflow and Infiltration has been identified by the City of Brookville as an issue and they are currently in the process of televising sewers in an effort to identify the sources of the inflow and infiltration.

The only complaints of basement flooding received since the previous inspection have been due to laterals from the residence to the main being clogged.

The logbook currently in use by the operators is not labeled as such (please reference 3745-7-9 (A)(3)(a)). The initials of the person(s) making the log entry are not being recorded (please reference 3745-7-09(A)(3)(f)). The logbook used by the operator of record is not kept onsite at the wastewater treatment plant as required (please reference 3745-7-09 (A)(2))



**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date: 2/28/92 Approval #: 05-274-PW Not submitted  N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y  
(Method: Land application of liquid sludge via injection)
- (d) If sludge is incinerated, where is ash disposed of? N/A
- (e) Is sludge disposal contracted..... Y  
(Name: Miller Brothers)
- (f) Has amount of sludge generated changed significantly since last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... Y
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

**Comments/Status:**

At the time of the inspection records demonstrating compliance regarding the land application of the sludge at agronomic rates were not available.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained..... Y  
Type of device: Ultrasonic & Parshall flume  Ultrasonic & Weir  Weir   
Calculated from influent  Other  (Specify: )
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: 6/24/08)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency  
 Daily  Weekly  monthly  other

**Comments/Status:**

Flow measurement is recorded on a circle chart and thru the SCADA system. It was discovered during the inspection that the data recorded on the circle chart is limited to a maximum flow of 5 MGD. The SCADA system however will record flows greater than 5 MGD.



**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... N
  - (i) Samples refrigerated during compositing..... Y
  - (ii) Proper preservation techniques used..... Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e., continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: All parameters but the following are analyzed by the contract lab: CBOD, TSS, Ammonia, pH, DO, and Temperature

Lab name: Belmonte Labs, Masi Environmental Laboratory

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. N
- (h) Adequate records maintained..... N
- (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory  
Date: Currently do not participate in the DMRQA Program

**Comments/Status:**

Since the previous inspection several Improvements in the QA/QC for the onsite laboratory have been implemented (recording of temperatures for incubator and refrigerator, blanks for CBOD, etc.). Although improvements have been made, pH calibrations and QC checks for both pH and ammonia are not being recorded. The recording of temperatures for the oven is also not being recorded. As part of the QA/QC program GGA samples are not being performed for CBOD analysis (please refer to Standard Methods for the Examination of Water and Wastewater – Method



5210B). It was also noted that samples for oil and grease were not being collected properly (using second container for collection and then transferring sample into sample bottle for analysis). The bench-top analytical balance for use in performing analysis of Total Suspended Solids has not been calibrated within the previous 12 months. The analyst does use a known weight in an effort to verify the accuracy of the balance but unfortunately does not record the results when this is performed. Samples are currently collected and analyzed by either operator but the custody of the samples is not recorded. The laboratory analyst do not currently participate in the U.S. EPA Discharge Monitoring and Reporting Quality Assurance Program (DMRQA). It is recommended that a formal QA/QC program be developed and implemented (please refer to Standard Methods for the Examination of Water and Wastewater 1020A and B).

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
1PC00000-001	Yes	None	None	None	None	Few	Clear	N/A

**Comments/Status:**

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

